

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Gregg Stephen Juris
Debtor 1
Maryanne Monica Juris
f/k/a Maryanne Monica Kane
Debtor 2

Chapter 13
Case No. 1:18-BK-01323-HWV
Matter: Motion to Incur Debt/Obtain Credit

DEBTOR(S)' MOTION TO INCUR DEBT

AND NOW, come the Debtor(s), Gregg Stephen Juris and Maryanne Monica Juris, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Motion to Incur Debt/Obtain Credit and aver as follows:

1. This case was commenced by the filing on March 30, 2018 of a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor(s) are seeking to purchase a personal residence.
3. Debtor(s) have obtained approval for financing from LMC located in Lancaster, Pennsylvania.
4. It is estimated that the monthly payments on the mortgage will be approximately \$1,800.00 per month, including escrow for real estate taxes and homeowner's insurance, for 360 months. The interest rate on the mortgage note will be 4.00% or less.
5. Debtor(s) are confident that the increased payments will not affect Debtor(s)' ability to continue his Chapter 13 payments.
6. Debtor(s) intend to make all payments on the mortgage note outside the Chapter 13 plan in this case.
7. For all the reasons set out above, Debtor(s) believes that the granting of this Motion will not materially or adversely affect the interests of any creditor, nor Debtor(s)' prospects for successful completion of the Chapter 13 Plan in this case and will instead permit Debtor(s) to purchase a personal residence which is necessary for the Debtor(s) to live in, and hence necessary for the successful completion of the Chapter 13 Plan in this case.

WHEREFORE, Debtor(s) moves this Honorable Court for leave to incur the new debt described above and prays for such other and further relief as the Court deems just and proper.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: January 7, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)



1794 Oregon Pike
Lancaster PA 17601
717-560-2114
NMLS #836585

Re: Mortgage Prequalification Letter

Date: December 10, 2020

Dear Gregg,

It is with great pleasure that LMC extends to you the pre-qualification of your home loan. We look forward to working with you throughout your loan process. **LOAN TYPE: FHA**

Name:

Gregg Juris
Rosalie Juris

Secured by the property located at:

TO BE DETERMINED

Loan Terms:

Sales Price: 422,770
Loan Amount: 331,760
Loan Term: 360
Interest Rate: 3.250

Specific conditions required prior to closing include the following:

1. Acceptable appraisal supporting the purchase price.
2. Title to be free and clear of all judgments and liens at the time of closing.
3. Rate subject to change until locked.
4. Subject to maintaining a minimum credit score of 640 and as COVID guidelines dictate.
5. Contingent upon sale/settlement of current home/FHA mortgage satisfied.
6. Evidence of Hazard Insurance and Flood Insurance (if required).
7. Loan subject to approval from underwriter once all documentation is received.

We understand that financing your home is one of the most important decisions you make in your lifetime. LMC would like to make your experience as delightful as the time you will spend in your new home. Please feel free to call us if you have any questions on the terms and conditions of this approval.

Sincerely,

Debra Martin
NMLS # 649823

PreQual - Lancaster

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Case No. 1:18-BK-01323-HWV
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NOTICE

Notice is hereby given that:

The Debtor(s) filed a Chapter 13 Bankruptcy Petition on **March 30, 2018**.

A hearing on the above-referenced matter has been scheduled for:

United States Bankruptcy Court Ronald Reagan Federal Building Bankruptcy Courtroom (3rd Floor) Third & Walnut Streets Harrisburg, PA 17101	Date: January 26, 2021 Time: 9:30 AM
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Any objection/response to the above-referenced matter must be filed and served on or before **January 21, 2021**.

If service was properly made and Respondent(s) fail to file any objection/response by the above-specified date, the Court **may** determine after review of the Motion that no hearing is required and grant the relief requested.

If a default order has not been signed and entered, the parties or their counsel are required to appear in Court at the hearing on the above date and time.

Date: January 7, 2021

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
DETHLEFS PYKOSH & MURPHY
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

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ORDER OF COURT

UPON CONSIDERATION of the Debtor(s) Motion to Incur Debt/Obtain Credit, said Motion IS HEREBY GRANTED, and the Debtor(s) is permitted to obtain financing from LMC for the purpose of purchasing a personal residence for Debtor(s), up to the purchase price of \$430,000, at an interest rate of 4.00% or less.

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CERTIFICATE OF SERVICE

I hereby certify that on Thursday, January 7, 2021, I served a true and correct copy of the **Debtor(s)' Motion to Incur Debt/Obtain Credit, Notice of Opportunity to Object and Hearing, and proposed Order** in this proceeding via electronic means or USPS First Class Mail upon the recipients as listed in the Mailing Matrix.

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire

Label Matrix for local noticing
0314-1
Case 1:18-bk-01323-HWV
Middle District of Pennsylvania
Harrisburg
Wed Dec 30 16:26:18 EST 2020

AT&T Mobility II LLC
%AT&T SERVICES INC.
KAREN A. CAVAGNARO PARALEGAL
ONE AT&T WAY, SUITE 3A104
BEDMINSTER, NJ. 07921-2693

AmeriCredit Financial Services
801 Cherry Street, Suite 3500
Fort Worth, TX 76102-6654

American Home Warranty
Attn: Bankruptcy Department
PO Box 7248
Santa Rosa, CA 95407-0248

Apotheker Scian, PC
520 Fellowship Road, Suite C306
PO Box 5496
Mount Laurel, NJ 08054-5496

Barclays Bank Delaware
PO Box 8803
Wilmington, DE 19899-8803

Capital One Auto Finance, a division of Capi
4515 N Santa Fe Ave Dept. APS
Oklahoma City, OK 73118-7901

Cavalry SPV I, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-2321

Collins Asset Group, LLC
Bass & Associates, P.C.
3936 E. Ft. Lowell Road, Suite #200
Tucson, AZ 85712-1083

(p)CREDIT CORP SOLUTIONS INC
121 W ELECTION RD
SANDY UT 84020-7766

ACAR Leasing LTD d/b/a GM Financial Leasing
PO Box 183853
Arlington, TX 76096-3853

Ally Financial
PO Box 337424
Roseville MN 55113-0004

American Express
PO Box 297871
Fort Lauderdale, FL 33329-7871

(p)AMERICREDIT FINANCIAL SERVICES DBA GM FINAN
PO BOX 183853
ARLINGTON TX 76096-3853

Asset Recovery Solutions, LLC
2200 East Devon Avenue, Suite 200
Des Plaines, IL 60018-4501

CACH, LLC its successors and assigns as assi
of Avant
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Capital One Bank USA, NA
PO Box 30285
Salt Lake City, UT 84130-0285

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Collins Asset Group, LLC
PO Box 11059
Austin, TX 78709-1059

Credit One Bank, NA
PO Box 98875
Las Vegas, NV 89193-8875

AT&T Mobility
PO Box 183853
Atlanta, GA 30333-7104

Ally Financial, Inc.
Ally Detroit Center
500 Woodward Avenue
Detroit, MI 48226-3416

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Americredit Financial Services, Inc.Dba GM F
P.O Box 183853
Arlington, TX 76096-3853

Avant
222 North LaSalle Street #1700
Chicago, IL 60614-1001

Capital One Auto Finance, a division of Capi
AIS Portfolio Services, LP
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

(p)CAVALRY PORTFOLIO SERVICES LLC
500 SUMMIT LAKE DR
STE 400
VALHALLA NY 10595-2322

Collection Center Industries
PO Box 8666
Lancaster, PA 17604-8666

Comenity Bank / PayPal Credit
Attn: Bankruptcy Department
PO Box 182125
Columbus, OH 43218-2125

DIRECTV
PO Box 5007
Carol Stream, IL 60197-5007

Charles J DeHart, III (Trustee)

8125 Adams Drive, Suite A

Hummelstown, PA 17036-8625

ELECTRONIC

Discover Bank

Discover Products Inc.

PO Box 3025

New Albany, OH 43054-3025

Discover Financial Services, LLC

PO Box 3025

New Albany, OH 43054-3025

Financial Recovery Services, Inc.

PO Box 385908

Minneapolis, MN 55438-5908

Jeffrey T. Bitzer, Esquire

1 West Market Street

York, PA 17011-125

Gregg Stephen Juris

806 Arbor Lane

York, PA 17406-7201

Maryanne Monica Juris

806 Arbor Lane

York, PA 17406-7201

LVNV Funding, LLC its successors and assigns
assignee of MHC Receivables, LLC and

FNBM, LLC

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Loan Depot

PO Box 77404

Ewing, NJ 08628-6404

MRS BPO, LLC

1930 Olney Avenue

Cherry Hill, NJ 08003-2016

Mariner Finance

8211 Town Center Drive

Nottingham, MD 21236-5904

Memorial Hospital

PO Box 505167

Saint Louis, MO 63150-5167

Midland Funding, LLC

2365 Northside Drive, Suite 300
San Diego, CA 92108-2709

Midland Funding, LLC

Midland Credit Management, Inc.

as agent for Midland Funding, LLC

PO Box 2011

Warren, MI 48090-2011

Miller Dipietro Associates

PO Box 143

Landisville, PA 17538-0143

Paul Donald Murphy-Ahles

Dethlefs Prakash & Murphy

2131 Market Street

Camp Hill, PA 17011-4706

Northstar Location Services

4285 Genesee St

Cheektowaga, NY 14225-1943

PA Emergency Physicians, PLLC

PO Box 975213

Dallas, TX 75397-5213

PRA Receivables Management, LLC

PO Box 1021

Norfolk, VA 23541-1021

Pennsylvania Department of Revenue

Bankruptcy Division

P.O. Box 280946

Harrisburg, PA 17128-0946

PennyMac Loan Services, LLC

P.O. Box 2010

Moorpark, CA 93020

Pennymac Loan Services

Attn: Bankruptcy Department

PO Box 514387

Los Angeles, CA 90051-4387

Pinneacle Health Memorial Hospital

PO Box 829774

Philadelphia, PA 19182-9774

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

Quantum3 Group LLC as agent for

Velocity Investments LLC

PO Box 788

Kirkland, WA 98083-0788

TD Bank USA / Target Card

PO Box 673

Minneapolis, MN 55440-0673

TD Bank USA, N.A.

C O WEINSTEIN & RILEY, PS

2001 WESTERN AVENUE, STE 400

SEATTLE, WA 98121-3132

Terminex

Attn: Bankruptcy Department

860 Ridge Lake Boulevard

Memphis, TN 38120-9408

United States Trustee

228 Walnut Street, Suite 1100

Harrisburg, PA 17101-1722

Verizon

500 Technology Drive, Suite 30

Weldon Spring, MO 63304-2225

James Warmbrodt

701 Market Street, Suite 5000

Philadelphia, PA 19106-1541

ELECTRONIC

Wells Fargo Bank, N.A.

Wells Fargo Card Services

PO Box 10438, MAC F8235-02F

Des Moines, IA 50306-0438

Wells Fargo Card Services

PO Box 14517

Des Moines, IA 50306-3517

DUPLICATE

Wellspan Health

1001 S George St

York, PA 17403-3676

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Americredit Financial Services, Inc.
Dba GM Financial
P.O Box 183853
Arlington, TX 76096

(d)Americredit Financial Services, Inc.
P.O Box 183853
Arlington, TX 76096

Cavalry Portfolio Services
PO Box 27288
Tempe, AZ 85285

Chase Card
PO Box 15298
Wilmington, DE 19850

Credit Corp Solutions, Inc.
63 East 11400 South 408
Sandy, UT 84070

Portfolio Recovery Associates, LLC
PO Box 41067
Norfolk, VA 23541-1067

(d)Portfolio Recovery Associates, LLC
POB 12914
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) PENNYMAC LOAN SERVICES, LLC

(d)PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

	End of Label Matrix
Mailable recipients	63
Bypassed recipients	2
Total	65

